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CICHANOWICZ, CALLAN, KEANE,  
VENGROW & TEXTOR, LLP

61 Broadway, Suite 3000

New York, New York 10006-2802

(212) 344-7042

*Attorneys for Defendants*

HAPAG-LLOYD CONTAINER LINIE GMBH d/b/a

HAPAG-LLOYD CONTAINER LINE

HAPAG-LLOYD (AMERICA) INC.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

INDEMNITY INSURANCE COMPANY  
OF NORTH AMERICA,

Plaintiffs,

- against -

M/V "LONDON EXPRESS", her engines, tackle,  
boilers, etc.; HAPAG-LLOYD CONTAINER  
LINIE GMBH; HAPAG-LLOYD CONTAINER  
LINE; HAPAG-LLOYD (AMERICA) INC.;

Defendants.

07 CV 3374 (Judge Lynch)

ECF CASE

**RULE 7.1 STATEMENT**

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure to enable Judges and Magistrate Judges of the Court to evaluate possible disqualification or recusal, the undersigned counsel for Defendant HAPAG-LLOYD CONTAINER LINIE GMBH d/b/a HAPAG-LLOYD CONTAINER LINE; HAPAG-LLOYD (AMERICA) INC. certifies that upon information and belief this party has a corporate parent, TUI AG, which is publicly held.

Dated: New York, New York  
May 31, 2007

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VENGROW & TEXTOR, LLP

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New York, New York 10006

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By: s/ Paul M. Keane

Paul M. Keane (PMK-5934)